

28

1  
2  
3 I, KENNETH B. QUANSAH, JR., plaintiff, complains of defendants 7-Eleven  
4 store # 25561 (Jay Mousavi, Sadu Sigh), 7-Eleven Corporation (Jay Mousavi ) and  
5 Meta Technologies, Inc. (Garick / Gore), a.k.a., for cause of action alleges;

6 1. The jurisdiction of this court is invoked. The above defendant 7-Eleven Store  
7 #25561 (Jay Mousavi, Sadu Sigh) has its principal work place in San Jose,  
8 California and it is a resident of San Jose, California. Defendant 7-Eleven  
9 Corporation (Jay Mousavi), does business in San Jose, California.

10 The above defendant Meta Technologies, Inc.(Garick / Gore ) a.k.a. has its  
11 principal work place in Mountain View, California and it is a resident of  
12 Mountain View, California. Mountain View, California is within Santa Clara  
13 County and Santa Clara County is under the jurisdiction of United States  
14 District Court for the Northern District of California.

15 2. Plaintiff Kenneth B. Quansah, Jr., is a resident of San Jose, California and San  
16 Jose, California is his permanent place of abode.

17 3.. The above cases started on the employers jobs within Santa Clara County . The  
18 venue herein is Santa Clara County and San Jose, California is the venue proper.  
19 Plaintiff therefore avers 28 U.S.C. Sec. 1391 for the subject matter venue.

20 4. Defendants 7-Eleven Store # 25561 and 7-Eleven Corporation are not charge in  
21 this complaint however, defendants are responsible and liable for all wrong done  
22 by their employees in this complaint

23 5. The issues and questions of law in 7-Eleven Store # 25561 case, 7-Eleven  
24 Corporation case and Meta Technologies, Inc. case are very related.

25 6. Plaintiff herein, invoke the jurisdiction of this court 28 U.S.C. Sec. 1343(a) to  
26 confer jurisdiction on the District Court to hear this case. Plaintiff also avers  
27 diversity jurisdiction in this case. Plaintiff herein confers jurisdiction on this court  
28 to hear this civil rights action involving intentional neglect and deprivation of his  
Constitutional protected rights.

7. Plaintiff demands a jury trial for all issues legally necessary for a trial by jury.  
Plaintiff invokes Fed, R. Civ. P. Rule 38 for this cause.

#### FIRST CAUSE OF ACTION

1. Plaintiff sue defendants 7-Eleven Store # 25561 (Jay Mousavi, Sadu Sigh),

1  
2 7-Eleven Corporation (Jay Mousavi) and Meta Technologies, Inc. (Garick / Gore)  
3 for deprivation of his Constitutional rights under the due process clause of the  
4 Fourth and Fourteenth Amendment.

5  
6 Defendant 7-Eleven Store # 25561 and 7-Eleven Corporation employees conspired  
7 with San Jose, California police herein, arrested him and detained him in a police  
8 cell / custody to intimidate him for asking for his unpaid wages or over due pay  
9 checks.

10 2. Plaintiff sue defendants, 7-Eleven Store # 25561 (Jay Mousavi, Sadu Sigh) and  
11 7-Eleven Corporation (Jay Mousavi) for violation of Title VII, 42 U.S.C. Sec.  
12 2000 et seq.

13 3. Plaintiff sue all the above defendants in this case for violation of his civil rights  
14 under 42 U.S.C. Sec. 1983.

15 Plaintiff claims he was kept uninformed about his weekly pay checks or wages.

16  
17 4. Plaintiff sue 7-Eleven Store # 25561 (Jay Mousavi, Sadu Sigh ) and 7-Eleven  
18 Corporation (Jay Mousavi ) for violation of his civil rights under 42 U.S.C. Sec.  
19 1985.

20 Defendants conspired and corroborated with San Jose, California police in a  
21 false arrest and detention to intimidate plaintiff.

22 5.. Plaintiff sue all the above defendants for deprivation of his Constitutional rights  
23 under the equal protection clause of the Fourteenth Amendment.


24 6. Plaintiff sue all the above defendants for deprivation of his civil rights under  
25 42 U.S.C. Sec. 1981.

26 Plaintiff claims for disparity and hostility in deprivation of above civil rights  
27 and Constitutional Rights.  
28

SECOND CAUSE OF ACTION

1. Plaintiff sue above defendants for negligence.
2. Plaintiff sue defendants 7-Eleven Store # 25561 (Jay Mousavi, Sadu Sigh )  
7- Eleven Corporation (Jay Mousavi ) for unpaid wages in the amount of  
Thirteen thousand one hundred sixty one dollars and fifty cents (\$13,161.50 ).
- 3.. Plaintiff sue above defendants for harassment.
4. Plaintiff sue all the above defendants for punitive damages as a result of  
above deprivation.
5. Plaintiff sue above defendants for mental suffering, intentional infliction of  
emotional distress, mental anguish and mental depression.
6. Plaintiff sue all the above defendants for humiliation.
7. Plaintiff sue above defendants for out of pocket expenses.
- 8 .Plaintiff sue above defendants for compensatory damages and general  
damages.
9. Plaintiff sue above defendants for violation of California Labor Code Sec.  
216 for refusing to pay wages, for false denial of past due wages and the  
validity of the wages.
10. Plaintiff sue defendant 7-Eleven Store # 25561 (Jay Mousavi, Sadu Sigh )  
for cause of action and for damages in the sum of Seven hundred fifty  
thousand dollars (\$750,000.00 ).

11. Plaintiff sue defendant 7-Eleven Corporation (Jay Mousavi ) for cause of action and for damages in the sum of three hundred fifty thousand dollars (\$350,000.00 ).
12. Plaintiff sue defendant Meta Technologies Inc. (Garick / Gore ) a.k.a. for cause of action and for damages in the sum of five hundred thousand dollars (\$500,000.00 ).
13. Plaintiff sue all above defendants for cause of action and for total damages in the sum of One million, six hundred thousand dollars (\$1,600,000.00 ).
14. Plaintiff prays for relief and seeks to recover the total sum of damages brought against above defendants.

  
KENNETH B. QUANSAH, JR.,  
Plaintiff, pro-se

JS 44 (Rev. 12/07) (and rev 1-08)

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON PAGE TWO OF THE FORM.)

## I. (a) PLAINTIFFS

KENNETH B. QUANSAH JR.

(b) County of Residence of First Listed Plaintiff  
(EXCEPT IN U.S. PLAINTIFF CASES)

SANTA CLARA COUNTY

(c) Attorney's (Firm Name, Address, and Telephone Number)

Pro-se

ADR

DEFENDANTS 7-ELEVEN STORE # 25561 (JAY MOUSAVI, SAOH SIGH) 7-ELEVEN CORPORATION (JAY MOUSAVI) META TECHNOLOGIES, INC.

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorneys (If Known)

UNKNOWN

C08 01012 JF  
SANTA CLARA COUNTY  
HRL

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 2 U.S. Government Defendant
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State ☒ 1 PTF ☒ 1 DEF
- Citizen of Another State ☐ 2 ☐ 2
- Citizen or Subject of a Foreign Country ☐ 3 ☐ 3
- Incorporated or Principal Place of Business In This State ☐ 4
- Incorporated and Principal Place of Business In Another State ☐ 5
- Foreign Nation ☐ 6 ☐ 6

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	<b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury — Med. Malpractice <input type="checkbox"/> 365 Personal Injury — Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input checked="" type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 530 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<b>LABOR</b> <input checked="" type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>SOCIAL SECURITY</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609 <b>FEDERAL TAX SUITS</b>
				<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from another district (specify)
- ☐ 6 Multidistrict Litigation
- ☐ 7 Appeal to District Judge from Magistrate Judgment

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Violation of Sec. 1983

Brief description of cause:

Refused to pay wages.

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

\$1,600,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

PLEASE REFER TO CIVIL L.R. 3-12 CONCERNING REQUIREMENT TO FILE "NOTICE OF RELATED CASE".

IX. DIVISIONAL ASSIGNMENT (CIVIL L.R. 3-2)  
(PLACE AND "X" IN ONE BOX ONLY)☐ SAN FRANCISCO/OAKLAND☒ SAN JOSE

DATE

SIGNATURE OF ATTORNEY OF RECORD